



U.S. Department of Justice  
Civil Division

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June 30, 2025

**By ECF**

Honorable Michael A. Hammer  
United States Magistrate Judge  
Martin Luther King, Jr., Courthouse  
and Federal Building  
Newark, NJ 07102

Re: ***Khalil v. Joyce, et al.*, Civ. Act. No. 25-1963 (MEF) (MAH)**  
**Government's Request for an Extension of June 30 Deadline**

Dear Judge Hammer:

Respondents ("the Government") respectfully request an extension of its June 30, 2025, deadline to respond to Petitioner's letter and the Court's order. *See* ECF Nos. 324, 325. The Government requests a two-day extension so that its response be due on July 2, 2025, at 9:00am. The Government makes this request for several reasons, all which establish good cause. Undersigned counsel conferred with Petitioner's counsel, and Petitioner consents to the extension, subject to the condition that there are no negative consequences in the interim.

*First*, the Government requests additional time to coordinate with the various agencies to finalize its response. *Second*, the Government's response must undergo several extensive layers of review before filing, and additional time is required to ensure that all relevant stakeholders have that opportunity. Undersigned counsel filed the Government's motion to stay the district court's release order on Thursday, June 26, 2025, and then had to finalize two opening briefs that were due in the Second Circuit on Friday, June 27, 2025. *See Mahdavi v. Trump*, No. 25-1113 (2d Cir.), *Ozturk v. Hyde*, No. 25-1019 (2d Cir.). Because of these deadlines, the Government could not move as quickly as it otherwise would have been able to, to coordinate with the relevant agencies and stakeholders. *Third*, over the weekend, undersigned counsel learned of a sensitive family matter that required immediate attention. As a result, the Government's ability to work on the response over the weekend was substantially impaired.

The Government continues to work diligently on this case and does not seek this short extension to cause prejudice or delay the proceedings. Rather, the extension is necessary so that the Government can effectively defend this case.

We thank the Court for its consideration of this request.

Respectfully submitted,

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